

RB-00124/mvk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
MAKEDA ALLEN-FRANCIS,

Plaintiff,

-against-

THE CITY OF NEW YORK, RIVERBAY
CORPORATION AND CO-OP CITY
DEPARTMENT OF PUBLIC SAFETY,

Defendants.
-----X

**RESPONSE TO
DEFENDANTS'
COMBINED DEMANDS**

Index No.: 14 CIV. 1738

Plaintiff, by her attorneys, DAVID HOROWITZ, P.C., as and for a response to Defendants RIVERBAY CORPORATION and CO-OP CITY DEPARTMENT OF PUBLIC SAFETY's Combined Demands dated May 7, 2014, alleges upon information and belief, as follows:

**RESPONSE TO DEMAND FOR AUTHORIZATION
FOR SOCIAL SECURITY ADMINISTRATION
EARNINGS RECORD STATEMENT**

Not applicable.

RESPONSE TO DEMAND FOR SOCIAL NETWORKING INFORMATION

Plaintiff objects to this demand as not calculated to lead to discoverable information.

RESPONSE TO DEMAND FOR PHOTOGRAPHS AND MEDIA

Plaintiff is not in possession of any photographs. Annexed is a copy of a video of the incident.

RESPONSE TO DEMAND FOR MEDICAL RECORDS

Authorizations to obtain Plaintiff's medical records from the following medical providers were previously provided on March 25, 2014:

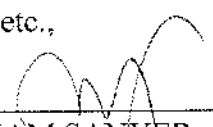
- Wingspan Psychiatric
981 Morris Park Avenue
Suite 2A
Bronx, New York 10462-3706
- Optima Physical Therapy & Rehabilitation, P.C.
Dr. Anthony A. Olokungbemi
4626 White Plains Road
Bronx, New York 10470
- Haven Counseling Center
Ruth M. Warwick
138 Columbus Avenue
Mount Vernon, NY 10553
- Sound Shore Medical Center of Westchester
16 Guion Place
New Rochelle, New York 10801

**RESPONSE TO DEMAND FOR INFORMATION
AND DOCUMENTATION PURSUANT TO THE
MEDICARE, MEDICAID AND SHIP EXTENSION ACT OF 2007**

Annexed is an authorization to obtain Plaintiff's Medicaid records, ID#:TG96026H.

Dated: New York, New York
May 21, 2014

Yours etc.,



WILLIAM SANYER
DAVID HOROWITZ, P.C.
Attorneys for Plaintiff
MAKEDA ALLEN-FRANCIS
276 Fifth Avenue, Suite 306
New York, New York 10001
(212) 684-3630
Our File No. 3599

TO: SMITH, MAZURE, DIRECTOR, WILKINS,
YOUNG & YEGERMAN, P.C.
Attorneys for Defendants
RIVERBAY CORPORATION and CO-OP
CITY DEPARTMENT OF PUBLIC SAFETY

111 John Street
New York, NY 10038
(212) 964-7400

ZACHARY W. CARTER
Corporation Counsel
Attorneys for Defendant
THE CITY OF NEW YORK
100 Church Street
New York, NY 10007
(212) 788-0499

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RESPONSE TO DEFENDANTS' COMBINED DEMANDS

DAVID HOROWITZ, P.C.

Attorneys for Plaintiff
276 Fifth Avenue - Suite 306
New York, New York 10001
212-684-3630

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated: May 21, 2014

Signature:

Print Signer's Name: WILLIAM SANYER

TO:

Service of a copy of the within

is hereby admitted.

Dated,

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Attorney(s) for